



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY
D.T.E. 05-27

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO THE ATTORNEY GENERAL OF THE COMMONWEALTH

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to the Attorney General of the Commonwealth the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Attorney General in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
2. The responses are due July 27, 2005.
3. These requests shall be deemed continuing so as to require further supplemental responses if additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding becomes available.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit seven (7) copies of the responses to A. John Sullivan, Rates and Revenue Requirement Division, one (1) copy to Glenn Shippee, and one (1) copy to Andreas Thanos. In addition to filing, all non-proprietary responses should be submitted by e-mail to A. John Sullivan, dte.efiling@state.ma.us, and to the e-mail address of any party required to be served within four calendar days.

INFORMATION REQUESTS

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| DTE-AG 1-1 | Refer to Exh. DJE-1 at 5, ln. 6. Please provide an analysis empirically supporting your statement that the Company’s proposed PBR will provide adequate compensation to Bay State in lieu of the Company’s proposed SIR program. |
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